Standardized Operational Compliance Inspection (~~08-30~~11-17-~~2011~~05~~22012~~)7-6-2012

~~DRAFT~~

The following information is provided as an outline of the steps to follow to set up and complete the inspection. It is not intended to be a stand-alone document. It is supported by the general requirements outlined in the "Preparing for an Inspection" Policy and all the ~~Compliance Guidance Documents (CGD)~~Technical Chapters. The Technical Chapters~~CGDs~~ contain the details for each item to be inspected and the records required. All correspondence, records, etc. shall be tracked in the Compliance Database when received or issued in accordance with the Compliance Tracking Instructions included in the Compliance Manual.

1. **Prepare for Inspection**
   a. A three (3) year list of facilities to be inspected will be provided by the Central Office biannually. Review the list and select facilities to be inspected using the first year for the appropriate region. Inspections can be coordinated based on proximity, owner/operator (O/O), etc. Inspectors should consider all reasonable requests from the O/O to schedule inspections if it will not interfere with the scheduled inspection cycle or generated list.

   b. Review the Notification database for O/O and facility information for the selected facility and record or print the facility report. This information shall include, but not be limited to:

      - Facility name and location
      - Owner name and address
      - Tank compartment status (CIU, TOS, etc.)
      - Tank/piping release detection method
      - Tank/piping material of construction/ CP system type
      - Piping type (suction/pressure)
      - Presence of spill protection
      - Type of overfill prevention

   c. Review the Compliance and Case tracking database for past inspection and release history. Review the Tank Helper database to determine if the owner/operator has designated A and B operators. If not, include reminder variable in scheduling letter.

Check the delivery prohibition list on the UST website to determine if the facility is on the list. If a facility is on the list, it should already be red tagged. If the compliance database does not indicate the tanks have been red tagged, contact the ~~Field Operations Coordinator~~Database Manager in order to determine if an Authorization to Remove the Red Tags has been issued. If not, the Database Manager~~Coordinator~~ will issue a Notice of Red Tag Application to the inspector. If the facility should not be on the list, the Database Manager will be notified. Check the Enforcement database for a possible active enforcement case and if identified, contact the Enforcement Section case manager to determine if inspection should be a follow-up to be forwarded to the Enforcement Section case manager or if inspection should be postponed.

d. Review the facility file for the previous inspection and determine if any reported releases or ongoing release investigations have occurred. If an ongoing release investigation/corrective action is identified, notify the contamination case manager of pending inspection. The discovery of a release during the inspection may be handled differently if a known plume is present. The case manager may also want to attend as well. There could be wells present for the investigation/cleanup that are not for release detection (RD) purposes. If the facility has an active enforcement case, contact the Enforcement Section case manager to determine if inspection should be a follow-up to be forwarded to the Enforcement Section case manager or if inspection should be postponed.

e. Personally contact the O/O **by phone** to schedule the inspection. While scheduling the inspection, if an ownership change is discovered, send a Notification for Underground Storage Tanks Form (CN 1260) to the new owner and a Sellers form (CN 0911) to the registered owner. During the phone call, ensure that the O/O or a duly authorized representative (DAR) who has knowledge of the UST system and its operation will be on site during the inspection and is able to open all manways, dispenser covers and provide print off information as designated below. Obtain alternate phone number of representative to be present. Complete checklist for records request including items that should be submitted based on what is registered with O/O or DAR to verify current information. If unable to reach by phone, indicate in the scheduling memo and go to next item.

f. Complete scheduling memo and track new inspection record (refer to appendix)

g. Issue FO-030 form letter (with checklist) confirming inspection and requesti~~re~~ records and signed checklist from O/O, in advance. The letter should be addressed to the owner of record in the Notification database. If the letter is refused or returned

unclaimed, then contact the ~~refer the~~ O/O for an accurate address. ~~to the Enforcement Section and issue appropriate FO-036 series NOV including Failure to Cooperate~~. If the O/O has not designated an A and B operator, include the reminder variable in scheduling letter. **If the database indicates the facility is on the voluntary register, ensure that the appropriate party is copied on all correspondence as outlined in the database. A note listing interested party information should be placed in each of the facility files in a prominently visible location.**

h. Track all correspondence in Compliance Tracking

i. Reserve a vehicle in accordance with the standard operating procedure for your field office.

2. Prior to Inspection-Records Review

Insure the records included in the response from the O/O are in accordance with the signature page with the checklist and are clearly identified with the facility information. Electronic submittals are acceptable. Records will not be returned as stated in FO-030 and the checklist. If the records are not received by the deadline or records are received but incomplete, contact the O/O and request the additional information~~this should be noted as a Failure to Cooperate violation of rule 1200-1-15-.03(2) in the Notice of Violation upon completion of the onsite inspection~~. Complete applicable records section of the UST Operational Inspection Form.

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a. **Release Detection (RD) Records** (refer to applicable Technical Chapter~~CGD~~ or the O/O checklist). Some items will be verified during the onsite inspection. Indicate on inspection form if release identified by RD method and notify case manager. If not notified of suspected release, issue form letter FO-038a, ~~Failure to Report a~~ Suspected Release-Unreported.

i. Statistical Inventory Reconciliation (SIR)-Do records provide the following information (see Technical Chapter 3.3):

- Summary page with monthly results indicating pass, fail or inconclusive
- SIR Vendor
- SIR Method (if Continuous In-Tank Leak Detection System (CITLDS), refer to section iii. below) Must be listed by NWGLDE
- Method meets tank size and flow-through criteria as noted in the third party certification (NWGLDE)
- A calculated leak rate not greater than 0.10 gallons per hour
- Inventory (raw) data available for last twelve months which shows:
- Water checked monthly and recorded
- Petroleum levels are measured to the nearest 1/8th of an inch

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- Raw data set covers thirty days (If not, refer to SIR ~~CGD~~Ttechnical Cehapter 3.3)
- Meters calibrated annually
- Last twelve months of records available
- All tests pass

ii. Automatic Tank Gauging (ATG)- Do records provide the following information (see Technical Chapter 3.2:

- Facility information
- Manufacturer name and model#
- Type of test (static, continuous, if Continuous In-Tank Leak Detection System (CITLDS), refer to section iii. below)
- Evaluate tank capacity limitations
- Last twelve months of ATG records are available
- Test measures to 0.2 gph monthly
- All tests pass
- Alarm histories are not required to be submitted but if the O/O provides the information voluntarily and an alarm is indicated, evaluate the reason for alarm to determine if additional review is needed (i.e. probe out)
- Test meets third party certification requirements

iii. Continuous In-Tank Leak Detection System (CITLDS) -Do records provide the following information:

- Summary page with monthly results including facility information
- CITLDS Vendor
- CITLDS Method
- Summary of monthly product throughput to insure method is viable
- Tank capacity limitations
- Last twelve months of records available
- Manufacturer name and model# of ATG
- Test measures to 0.2 gph monthly
- All tests pass

iv. Interstitial Monitoring- (tanks and piping are listed separately in order to address situations in which interstitial monitoring is used on only tanks or piping. See Technical Chapter 3.4). Insure records provide the following information and are submitted on the standardized forms:

For tanks and piping (all tanks and piping installed or replaced after 7/24/07 shall be secondarily contained with interstitial monitoring, however IM may be used for older tanks):

- Monitoring of interstitial space –electronic only (manual or visual monitoring is no longer allowed if IM is the RD method selected for systems installed prior to 7/24/07)
- Type of monitoring device (liquid, pressure, discriminating)
- Monitoring device is certified by third party (on NWGLDE list)
- Last twelve months of sensor status reports available
- Last twelve months of alarm history reports available
- All tests pass

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v. Manual Tank Gauging-Do records provide the following information:

- Tank size and diameter verified by O/O on records request checklist
- The method applicable for the tank size (less than or equal to 2,000 gal.)
- Based on the tank size (including test duration and diameter) in Table 1 of the MTG ~~CGD~~Technical Chapter 3.1, a tightness test was required and conducted
- The time interval between stick readings is appropriate for tank size
- Tank liquid level measurements taken at beginning and end of appropriate duration of test
- Level measurements are based on two consecutive stick readings at both the beginning and ending of required test duration
- Petroleum levels are measured to the nearest 1/8th inch and measurements recorded to the nearest 1/8th inch
- Last twelve months of records available
- All tests pass

vi. Tank Tightness Testing-If tank tightness test required, identify the following:

- Complete tank tightness test includes testing of ullage space
- Tank tightness test was performed within the last 5 years if conducted in conjunction with manual tank gauging
- The report format should include information outlined in ~~CGD~~Technical Chapter ~~11~~23.7

vii. Pressurized piping – Identify the following: (requires one catastrophic **and** one periodic option (see Technical Chapter 3.5)

1). Catastrophic (Automatic line leak detectors) including shear valve function Test, if required by manufacturer:

a) Mechanical Line Leak Detectors
   - Annual line leak detector test (must meet 3.0 gph at 10 pounds per square inch (psi) or equivalent leak rate, not just– pass/fail results. If >3.0 gph, must replace)

b) Electronic line leak detector

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- Annual line leak detector test (must meet 3.0 gph at 10 psi or equivalent leak rate, not just –pass/fail results. If >3.0 gph, must replace);

2). Periodic (annual line tightness test or monthly monitoring)

a) If annual line tightness test, test must be provided including information outlined in ~~CGD~~Technical Chapter~~-~~ 3.5~~110~~

b) Electronic line leak detector – have last twelve months of passing 0.2 gph tests or annual 0.1 gph test.

c) Monthly monitoring – have last 12 months of acceptable monthly monitoring results

viii. Suction Piping – Identify the following (see Technical Chapter 3.6**:**

- American (U.S.) Suction Piping – three year line tightness test or last twelve months of monthly monitoring records
- European (safe) Suction System – No release detection is required on suction piping that is designed and constructed to meet the following:
  1) Below-grade piping operates at less than atmospheric pressure
  2) Below-grade piping is sloped so that the contents drain back into the storage tank if suction is released
  3) **Only one** check valve is present **and** is directly below the suction pump (if previously verified for the current piping, not required to resubmit)

b. **Corrosion Protection records** (impressed current or galvanic system survey form must be completed and submitted. See Technical Chapter 4.1)

The most current 3 year cathodic protection test results and the previous 3 year cathodic protection results and if applicable, cathodic protection test results conducted within six months after a repair to the CP system shall be provided on the Division's form (either CN 1140 or CN 1309) and shall be complete. If CP test results indicate readings are not consistent with the reported material of construction, discuss with O/O during onsite inspection and follow outlined procedures in Section 4.h.3.

For impressed current systems, a rectifier log containing at least the last three required readings shall be provided on Division Form CN 1282.

i. **Interior Lining-**(if impressed current or galvanic cathodic protection is not present or active, the following records must be maintained. See Technical Chapater 4.1):

1) The ten year internal lining inspection and subsequent five year inspection results
2) Lining manufacturer's warranty
3) Tightness test results for before and after addition of internal lining (see tank

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tightness testing section above and ~~CGD~~Technical Chapter 3.7)

c. **Spill bucket/dispenser logs** (refer to ~~applicable CGD~~ Technical Chapa~~t~~er 4.2 or the O/O checklist)

Must be completed for the last 12 months, signed by person inspecting, and showing any actions taken as a result.

d. **Overfill** verification-(not required for systems filled by transfers of no more than twenty-five (25) gallons at one time). See Technical Chapter 4.2.

Must be verified by one of the options below:

- Ball Float Valve (cannot be used with suction piping, pressurized deliveries, remote fills or coaxial stage I vapor recovery)
  1) Invoice verifying installation ~~(if installed within the last 3 three years)~~; or
  2) Visual verification documented by third party certification; or
  3) Field verified by inspector during inspection

  ~~After the initial verification, if the O/O does not elect to provide visual verification, a flapper valve or audible/visual alarm shall be installed.~~

  If a tank owner elects to install a flapper valve in addition to a ball float, it must be set to activate at a lower shutoff level than the ball float according to PEI RP-100.
- Flapper valve (verify presence during day of inspection)
- High level alarms-(verify presence during day of inspection)

e. **Installation**-
If new installation within the last twelve (12) months, installation records including tank bill of lading, installation checklist, installer's invoice, air pressure and initial systems test prior to dispensing (see tank tightness test section above and ~~CGD~~Technical Chapter 3.7). For a safe suction system, installation records indicating only one check valve is present in the piping immediately below the dispenser or a signed statement from a contractor verifying the same and describing how the determination was made.

f. **Repair/replacement**, if applicable.

- Records of repairs to release detection or cathodic protection equipment (for three years after repair for all fixed equipment)
- Records of repairs to steel tanks or fiberglass-reinforced plastic (FRP) tanks or FRP piping. Tightness test or monthly monitoring results following repair (see tightness testing section above).

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- Tightness test results conducted no later than 6 months but no sooner than 3 months following the addition of anodes to any cathodic protection system. See release detection record section above for tank tightness testing and ~~the CGD~~Technical Chapter 3.7.

g. **E85**, if applicable-Ethanol Equipment Compatibility Checklist and Statement of Compatibility must be provided (may not be onsite- must be in C.O.)

3. **Day of Inspection**
   a. Gather equipment (refer to Preparing for an Inspection)
   b. Gather paperwork-including previously submitted records, UST Operational Inspection Form (applicable schedules) and UST database facility report
   c. Get vehicle
   d. Confirm directions to location (i.e. Mapquest, Google, Yahoo)

4. **Conducting the Inspection-The following information is provided as an outline of the steps to follow to complete the inspection. It is not intended to be a stand-alone document. It is supported by the general requirements outlined in the "General Requirements for an Inspection" Policy and all the ~~Compliance Guidance Documents (CGD)~~Technical Chapters. These ~~CGDs~~ contain the details for each item to be inspected and the records required.**

   a. Notify facility O/O upon arrival. If no representative is present, call provided alternate number or consult onsite employee. If no onsite contact available, return to office and issue appropriate FO-036 ~~series~~letter ~~NOV including Failure to Cooperate~~.

   b. Complete UST Operational Inspection Form (applicable schedules) for all appropriate sections and indicate "N/A" if not applicable.

   c. Verify name of facility, address and ID#

   d. Verify owner name and address

   ~~d.~~e. Ask to see the designated C operator sign or instruction manual. If not available, then include as a violation in Results of Inspection letter. If facility is unmanned, then the designated B operator who is also trained as the designated Class C operator will cover this requirement.

   ~~e.~~f. Collect lat/long at tank system if not previously collected

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~~f.~~g. Indicate if UST regulated unregistered tank discovered, have O/O complete notification form and O/O sign. ~~If O/O not willing to complete and sign, add Failure to Cooperate with the results of inspection letter.~~Add unregistered tank finding to Results of Inspection letter citing statute language and referring to enforcement. If O/O is not present, send completed notification form with the results letter and require O/O to sign, ~~and~~ return to the inspector for forwarding and~~.~~ ~~I~~issue FO-032 for ~~Failure to Register~~Unregistered Tank.

~~g.~~h. If the facility has been red tagged but not authorized to remove, determine if red tags are still in place. If red tags have been removed, make photos of fill ports and indicate if facility is in operation, collect all applicable information, record product levels, and forward to the Field Operations Coordinator.

~~h.~~i. **Inspect UST Equipment and Facility Perimeter**

This outline was designed to aid the inspector of equipment to inspect based on the location of the component to be inspected and does not necessarily fit into the broad category. Some items may be repeated if located in multiple areas to be inspected. It is not intended to dictate the actual order of inspection but to insure that all system components are inspected. The owner/operator or DAR should provide safe access to all manways and dispensers and remove covers during the inspection. The inspector should take time to thoroughly inspect all equipment. If evidence of a release is discovered, notify contamination case manager and refer to Rule 0400-18-01~~1200-1-15~~.05 for steps to complete under suspected release including dispenser and STP manways/sumps, environmental impacts, unusual operating conditions, etc. **Pictures should be taken of the UST facility and all tank system anomalies (water in sump, flex piping failure, uncertain violation(s)) and issues that will warrant additional review.**

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1. Verify system configuration including number, size, contents, location, manifolded, and compare to Division records. If discrepancies between database and actual equipment, etc. exist, then the owner/operator shall complete a notification form (CN 1260) with changes and have owner/operator sign. If O/O is not present, mail Notification Form to O/O for completion. Require O/O to return signed form by established deadline to inspector who will forward to Notification Section Manager.
2. If applicable, i~~I~~dentify if O/W separator is present and has separate holding tank that is regulated and not registered. If not registered, complete Notification Form and refer to Addendum-Atypical UST Systems
3. Submersible Turbine Pump Manways/Sumps/Other Access Port Location

- Check for presence of seepage or drips.
- Is vent tube connected, if required
- Check for cleanliness and/or water/soil intrusion
- Inspect wall integrity, seals, gaskets. Determine if observable (have onsite representative demonstrate if questionable) tank top fittings are tight to insure proper operation of ball float valves, if present. Examples include vapor recovery poppet must seat properly, ATG probe cap installed properly and not cracked, unused or other gauging ports, etc.
- If present, determine if manifold lines and siphon assist are corrosion protected (piping associated with vapor recovery does not require CP, see Atypical UST Systems, Stage I and II Vapor Recovery section)
- If sumps are present: For any sumps that were installed after July 24, 2007 or sumps associated with interstitial monitoring for release detection regardless of installation date and cracks are discovered, then sump or entry boots must be repaired or replaced. If liquid is found in a sump, require the O/O to remove and properly dispose of the liquid and determine the source.
- If sump sensors are present, insure they are properly placed and functioning as designed. Inspectors should not initiate sensor alarm test, the proper function should have been demonstrated on the Division provided form CN 1339. If debris or liquid is found (small amounts of debris/liquid/residue are acceptable as long as it does not interfere with the placement or the operation of the sensor), the O/O or DAR should be advised to expeditiously remove and properly dispose of debris/liquid/residue in accordance with local, state and federal requirements.
- Piping type (suction/pressurized), configuration/presence of flex connectors or swing joints (typically seen in metallic piping runs), are CP requirements met
- If the reported material of construction is different from what is actually present, require completion of a notification form and/or CP testing, if required. If CP results indicate material of construction is not as reported, require verification by:
  a. invoice verifying installation (if installed within the last 3 three years), or
  b. visual verification by third party certification with photographs of piping material.
- If first generation TCI flex piping is identified, issue appropriate FO-035 ~~NOV~~. See ~~CGD 110~~Technical Chapter 3.5 for example photos.
- If sub pump is covered with soil (not isolated), require removal of the soil to allow inspection of equipment or corrosion protection may be required (all metal components of the tank, piping and underground ancillary equipment that routinely contains petroleum and is in contact with the ground must have continuous corrosion protection in accordance with .02(4)(c)1).
- Verify interstitial monitoring equipment is properly located and positioned to detect a release

- Line leak detectors, if required, are they present and located in the proper location. For electronic line leak detectors, an authorized representative shall be available to print off pressure line leak setup information every six years or if a problem is identified onsite (i.e. low product level) ~~s~~which will require a follow-up inspection with setup provided thereafter.~~.~~ If Veeder Root ELLD, t~~T~~he inspector should verify piping type and length settings using Rollatape to insure the estimated piping length matches the reported length (within fifty feet) on the provided setup information to insure ELLDs are setup correctly.

4. Fill Port/Spill Bucket(s) Location

- Visually confirm buckets appear to be functional (no holes or cracks, no debris). If debris or liquid is found and immediately removed, this would not be a violation. If not immediately removed, require removal as a violation in the results of inspection letter. If not removed within timeframe outlined, issue as a violation in Enforcement Action Notice. If the inspector encounters a cracked, defective, etc. spill bucket during an inspection, they should inform the O/O that a replacement is required unless the damaged part is a component for which the manufacturer provides repair parts and allows repairs to be conducted. Some companies provide spill bucket liners, however, most manufacturers do not support the installation of liners as an acceptable repair to the spill bucket. Depending upon the appearance of the damage to the spill bucket, an owner/operator may be given an opportunity to conduct an integrity test in lieu of replacement. If the integrity test determines that the bucket is tight, it would not require replacement. ~~The integrity test must be repeated each year thereafter until the bucket is replaced.~~ Refer to ~~CGD 113~~Technical Chapter 4.2, Appendix 1 for Hydrostatic Testing Procedures. Inform the O/O and ~~include~~ request in results of inspection letter that they ~~will be required to~~ notify the inspector 72 hours prior to replacement so that the inspector can be present to determine if an environmental impact has occurred. ~~Include statement "If the Division is not notified in a timely manner, any release discovered may not be covered by the UST Fund."~~ If properly notified, the inspector would inspect beneath the spill bucket to determine if staining and/or free product is present. If contamination is discovered, a site check would be required (issue form letter FO-001scsp). This would involve placing one boring in the assumed downgradient direction of the tankhold which houses the defective bucket but outside the tankhold (we don't want to encourage possibly damaging the tank(s)). ~~If the O/O fails to notify the inspector, they should be cited for Failure to Cooperate which will result in the standard penalty assessment.~~

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- Determine if drop tube is present, if required (for SIR, to exempt risers from CP or for a flapper-valve installation)
- Determine if measurements made through a drop tube using gauging stick (for SIR only). Gauging stick should measure to the nearest 1/8th of an inch and in good condition ~~be acceptable for use~~.
- If SIR records indicate no water readings were collected, randomly select a tank for the O/O to measure for water level (if applicable, verify matches SIR records)
- Presence of overfill equipment (visually verify flapper valve or other automatic shutoff, if applicable)
- Each spill catchment basin shall be provided with a lid that is in good condition and is not in contact with the fill cap.

5. Overfill equipment (if not flapper or other automatic shutoff) Location

- If ball float valve, (not to be used with suction system, coaxial Stage I vapor recovery and pressurized deliveries). If observable, - determine ~~(have onsite representative demonstrate if questionable)~~ if tank top fittings are tight to insure proper operation of ball float valves, if present. Have onsite representative demonstrate functionality if questionable.
- Determine if evidence of an overfill is present
- High level alarms-(verify presence and see Technical Chapter 4.2~~CGD 113~~ for operability)
- Determine if alarm is visible and/or audible to the delivery driver

6. Dispenser Location

- Check for presence of seepage or drips and note as an observation to be addressed and if applicable, consult Modified Site Check Policy for Dispenser Leaks (issue form letter FO-001scd). If not repaired within timeframe outlined, issue as a violation ~~in Enforcement Action Notice~~.
- Debris that is found under a dispenser may interfere with the following: observing a leak, determining if flex connectors require boots/CP or to determine if shear valves are properly anchored. Debris should be immediately removed. If not immediately removed, require removal as an observation in the results of inspection letter.
- Inspect sumps, if present
- For any sumps that were installed after July 24, 2007 and cracks are discovered, then sump or entry boots must be repaired or replaced. If debris/liquid is found in a sump (small amounts of debris/liquid/residue are acceptable as long as it does not interfere with the placement or the operation of the sensor), require the O/O to

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remove and properly dispose of the liquid in accordance with local, state and federal requirements. If damaged sump appears to have allowed a release to the environment, consult Modified Site Check Policy for Dispenser Leaks (issue form letter FO-001scd).

- If sensors are present, insure they are properly placed and functioning as designed. (Inspectors should not initiate sensor alarm test). If liquid is found, the O/O or DAR should be advised to expeditiously remove and properly dispose of in accordance with local, state and federal requirements.
- If discrepancies between database and actual equipment, etc. exist, then require O/O to complete Nn~~n~~otification F~~f~~orm with changes and sign. If O/O is not present, mail Notification Form to O/O for signature. Require O/O to return signed form by established deadline to inspector.
- Verify piping type (suction/pressurized), configuration, and presence of flex connectors and/or swing joints (typically seen in metallic piping runs). Determine if CP requirements are met. If piping installed after November 1, 2005 determine piping manufacturer and additional information outlined in rule ~~1200-1-15~~0400-18-01-.02(4)(b)1. and UL971.
- If not previously verified by inspector in the inspection database, identify material of construction (by original installation records or excavation to verify).
- If first generation TCI flex piping is identified, issue appropriate FO-035 ~~NOV~~. See ~~CGD 110~~Technical Chapter 3.5 for example photos.
- If applicable, determine if E-85 compatibility documents have been submitted by the O/O. If documents not on file, require documents as a violation in the results of inspection letter~~NOV issued after the inspection~~.
- Check for presence of satellite dispensers (refer to addendum Atypical UST Systems)
- If dispenser nozzles are bagged, ~~determine why~~ ask if related to regulated issue
- Ensure shear valves are properly anchored and function test has been performed during annual line leak detector test if required by manufacturer (see ~~CGD-110~~Technical Chapter 3.5)

7. Identify CP equipment (everything not seen at manways or dispensers)

- Locate rectifier box if system is impressed current
- Verify that the impressed current system is turned on (inspectors should not activate).
- Verify power warning and alarm lights functional, if present.
- Determine if volt and amp gauges appear to be operating properly
- If present, inspect junction box to determine number of anodes.
- Check rectifier log if not previously provided.

- Note the volt and amp readings at time of inspection and determine if they are consistent with readings from rectifier log.
- Document if exposed or broken anode wires are present and require repairs.

8. Site evaluation (to determine if environmental impact is present and if so, refer to contamination case manager)-check for:

- Surface water impacts
- Storm/sanitary sewer impacts
- Petroleum vapors in buildings
- Stained soil and/or parking lot from spill, overfill or underground release (with the exception of diesel dispenser)
- If new concrete patches, ask for repair/replacement records if related to UST regulated issue
- If release is **suspected or confirmed** and observation wells are present and can be accessed, require the O/O or DAR to open the well and the inspector should use a bailer to determine if free product is present.
- Indications of an unapproved closure

9. Inside facility

- If ATG present, insure operational (inspectors should not touch or instruct on use). An authorized representative shall be available to print off setup information every six years or if a problem is identified onsite (if ATG is programmed improperly for size of tank, ATG should be reprogrammed which will require a follow-up inspection with setup provided thereafter to insure it is setup in accordance with manufacturers requirements), original current inventory report and original leak history (if only the leak history was provided in records submittal) from the ATG (see ~~CGD 104~~Technical Chapter 3.2 for required setup information). If leak detection records are missing or invalid, inspectors will obtain a copy of the in-tank alarm history report to determine if any tank alarms were documented during that time frame. If records are not available~~,~~ on the day of the inspection, then the O/O should be cited for a failure to meet the compliance deadline (date of inspection) in accordance with rule 0400-18-01~~1200-01-15-~~.03(2)(c)2. and a new deadline established to submit required records.

~~issue NOV for Failure to Cooperate and outline in NOV that original reports shall be submitted.~~

- For ~~-~~electronic line leak detectors, an authorized representative shall be available to print off pressure line leak setup information every six years or if a problem is

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identified onsite which will require a follow-up inspection with setup provided thereafter. If Veeder Root ELLD, t~~T~~he inspector should verify piping type and length settings using Rollatape to insure piping length matches the reported length on the provided setup information (within fifty feet). (If approximate piping length does not match setup information, the LLD will not function properly and the information should be submitted for additional review).

- If rectifier located inside, see CP section above

~~i.~~j. Take photographs of the UST facility including the layout and all tank system anomalies (water in sump, flex piping failure, uncertain violation(s)) and issues that require additional review. The photographs should be burned to a R/W CD or DVD and placed in the file.

~~j.~~k. Records (**not previously provided** or if anomalies determined i.e.-inspector determines new information onsite requiring additional records). For further detail, see section 2. Copies of these records shall be provided at the inspection. If still not provided on the day of the inspection, then~~and~~ the O/O should be cited for a failure to meet the compliance deadline (date of inspection)~~cooperate~~ in accordance with rule ~~1200-01-15~~0400-18-01-.03(2)(c)2. and a new deadline established to submit required records.

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1. RD records
2. CP records
3. Repair/replacement, if applicable
4. Spill bucket/dispenser logs
5. Installation records, if applicable
6. Request delivery records, if tanks are red tagged or unregistered tank(s) are discovered
7. Determine if unreported release

~~k.~~l. Temporarily Out of Service (check product levels, CP operational, RD if product present and greater than one inch, if TOS >3 months; all pumps, lines, manways, ancillary equipment secured, properly registered as TOS)

~~l.~~m. Complete site sketch sheet unless sketch completed in previous inspection and no updates

~~m.~~n. Complete site evaluation section on inspection form with photos

n. O/O discussion (discuss violations, if found. If additional review is needed before discussing violations, explain that violations will be outlined in forthcoming letter noting additional records if needed, answer questions and offer suggestions to

organize records). If inspector later discovers issues that were not discussed onsite, contact O/O to notify prior to issuing letter. If tank internal lining is the only method of corrosion protection, inform the O/O that they must add CP by December 22, 2012 or permanently close the tank.

Provide the Departmental pamphlet regarding mercury disposal or state the following: "Are you aware that, if any of the following criteria apply to your business and your business utilizes mercury-added consumer products, such as fluorescent light bulbs, the Mercury Product Control Act applies to your business:
(1) Employs ten (10) or more employees;
(2) Owns or maintains a building of at least three thousand (3,000) square feet, excluding private residences;
(3) Owns or maintains one (1) or more electrical distribution systems;
(4) Engages in the demolition of buildings, excluding private residences; or
(5) Owns or operates a tanning bed salon?

The Mercury Product Control Act requires proper recycling of mercury-added consumer products rather than disposing of such products in the solid waste stream. Do you have a plan for recycling mercury-added consumer products?"

o. Inspector shall sign inspection form and have O/O or DAR sign inspection form. Their signature does not imply agreement with the findings. If O/O refuses, indicate on signature line.

10. Inspection Follow-up

a. Review subsequent records (paper or photographs), if applicable. If records not provided in advance or on date of inspection, cite rule ~~1200-1-15~~0400-18-01-.03(2)(c)2.

If ownership issues were encountered during the scheduling or inspection process but were resolved through proper registration, issue all correspondence to the new registered owner. If ownership was unresolved, issue correspondence to registered owner. If tank internal lining is the only method of corrosion protection, include language in the correspondence to inform the O/O that they must add CP by December 22, 2012 or permanently close the tank.

b. If no violations found, issue FO-037

c. If violations found (if uncertain of violation type, contact the Enforcement Section):

~~i.~~ Violations found (if not identified in regulation, would be considered observation and should be noted in accordance with the ~~applicable~~ form letters), issue FO-036 Results of Inspection. If additional information is needed to properly complete, complete that variable. If the O/O has not designated a Class A/B, include as a violation in the Results of Inspection letter. If a C operator could not be verified

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during the inspection by viewing a sign or instruction manual, then include in Results of Inspection letter. ~~If only correctable violations found, issue FO-036CV~~

~~ii. If both correctable and non-correctable violations found, issue FO-036NCV~~

~~iii.~~i. ~~If only non-correctable violations found, issue FO-036b and prepare Enforcement Action Request~~

~~iv.~~ii. If specific violations for TCI piping, spill bucket replacement, failure to register, or failure to report a suspected/confirmed release are discovered as noted during the inspection, use the applicable form letter for each.

d. If reasonable extension request filed, issue extension ~~of up to 15 days~~as outlined in the Enforcement Policy.

e. If ~~incomplete submittal or no response to correspondence~~enforcement action required as outlined in the Enforcement Policy~~NOV~~, then issue FO-036a and prepare Enforcement Action Request.

f. If new N~~n~~otification F~~f~~orm was completed during inspection or required to update information, upon receipt of the form, the inspector will then forward to the Notification Section Manager.

g. Track all correspondence in Compliance Tracking.

h. Complete SOC table for both Release Detection and Release Prevention.

i. If inspection is being conducted in accordance with .09(10)(c) as a result of a release, complete the .09(10)(c) form and submit to Fund Eligibility Coordinator.

j. If applicable, draft memo to EFOM for referral to appropriate agency if non-regulated issues observed.